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LNE: USAO 2024R00303

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

LAWRENCE SMITH,

Defendant.

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CRIMINAL NO. GLR-24-0241

(Possession of a Firearm and
Ammunition by a Prohibited Person,
18 U.S.C. § 922(g)(1); Possession with
Intent to Distribute a Controlled
Substances, 21 U.S.C. § 841(a)(1);
Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime, 18 U.S.C. § 924(c)(1)(A)(i);
Forfeiture, 18 U.S.C. § 924(d), 21
U.S.C. § 853, 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about March 18, 2024, in the District of Maryland, the Defendant,

LAWRENCE SMITH,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Glock model 23 handgun, bearing serial number RYR412, and approximately 90 rounds of .40 caliber ammunition, 32 rounds of 9mm ammunition, 2 rounds of .357 caliber ammunition, 37 rounds of 5.56 caliber ammunition, 42 rounds of .45 caliber ammunition, 5 rounds of .38 caliber ammunition, and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT TWO
(Possession with Intent to Distribute a Controlled Substances)

The Grand Jury for the District of Maryland further charges that:

On or about March 18, 2024, in the District of Maryland, the Defendant,

LAWRENCE SMITH,

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny]] propanamide, commonly referred to as fentanyl, a schedule II controlled substance; and an amount of a mixture or substance containing a detectable amount of cocaine, a schedule II controlled substance.

21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi) and (C)

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about March 18, 2024, in the District of Maryland, the Defendant,

LAWRENCE SMITH,

did knowingly possess a firearm, to wit, a Glock model 23 handgun, bearing serial number RYR412, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as alleged in Count Two of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under any of the offenses charged in Counts One through Three of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in Count Two of this Indictment, the Defendant,

LAWRENCE SMITH,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

Firearms and Ammunition Forfeiture

3. Upon conviction of the offense(s) alleged in Counts One or Three of this Indictment, the Defendant,

LAWRENCE SMITH,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:

- a. a Glock model 23 handgun, bearing serial number RYR412;
- b. approximately 98 rounds of .40 caliber ammunition;
- c. approximately 32 rounds of 9mm ammunition;
- d. approximately 2 rounds of .357 caliber ammunition;
- e. approximately 37 rounds of 5.56 caliber ammunition;
- f. approximately 42 rounds of .45 caliber ammunition; and
- g. approximately 5 rounds of .38 caliber ammunition.

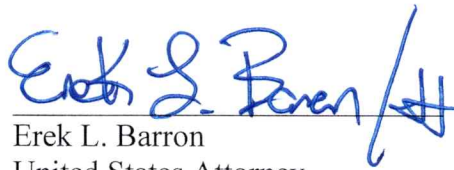
Substitute Assets

5. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)
21 U.S.C. § 853
28 U.S.C. § 2461(c)


Erik L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

✓ Foreperson

8/8/2024
Date